

Exhibit F

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA E. VARNER,
Plaintiff,
vs.
CIVIL ACTION
NO. 1:CV 01-0725

COMMONWEALTH OF PENNSYLVANIA,
NINTH JUDICIAL DISTRICT,
CUMBERLAND COUNTY; CUMBERLAND
COUNTY; S. GARETH GRAHAM,
Individually, and JOSEPH
OSENKARSKI, individually,
Defendants.

Deposition of: RONNA BOYLES

Taken by : Defendants

Date : March 3, 2003, 12:22 p.m.

Before : Emily Clark, RMR, Reporter-Notary

Place : 12 West High Street
Carlisle, Pennsylvania

APPEARANCES:

DEBRA K. WALLET, ESQUIRE
For - Plaintiff

ADMINISTRATIVE OFFICE OF PENNSYLVANIA COURTS
BY: A. TAYLOR WILLIAMS, ESQUIRE
For - Defendant Commonwealth of Pennsylvania
Ninth Judicial District, Cumberland County

THOMAS, THOMAS & HAVER
BY: PAUL J. DELLASEGA, ESQUIRE
For - Defendant Cumberland County

1 I N D E X

2 WITNESS

3 Ronna Boyles Examination
4 By Mr. Dellasega 4, 47, 49, 51
5 By Ms. Wallet 26, 49, 50, 51
6 By Ms. Williams 41, 50
7 By Mr. Adams 43
8
9

10 EXHIBITS

11 (None marked)

12 * * * * *

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1 APPEARANCES (continued):

2 MONTGOMERY, McCracken, Walker & Rhoads, LLP
BY: L. KRISTEN BLANCHARD, ESQUIRE
For - Defendant S. Gareth Graham

3 SWEENEY & SHEEHAN, P.C.
BY: PAUL LANCASTER ADAMS, ESQUIRE
For - Defendant Joseph L. Osenkarski

4 ALSO PRESENT:

5 MS. BARBARA E. VARNER

6 MR. S. GARETH GRAHAM

7 MR. JOSEPH L. OSENKARSKI

1 STIPULATION

2 It is hereby stipulated by and between the
3 respective parties that signing, sealing, certification
4 and filing are waived; and that all objections except
5 as to the form of the question are reserved until the
6 time of trial.

7
8 RONNA BOYLES, called as a witness, being duly
9 sworn, was examined and testified, as follows:

10 BY MR. DELLASEGA:

11 Q. Mrs. Boyles, we talked over the phone last week. I'm
12 Paul Dellasega. I represent the county. We're taking
13 your deposition today as part of a lawsuit brought by
14 Barbara Varner against the county, the court, and
15 Osenkarski and Gram in the nature of a sexual
16 harassment suit.

17 Have you ever been deposed before?

18 A. No.

19 Q. Okay. You have to answer questions under oath, and
20 it's important to us that you understand the question
21 before you answer it. So that if you don't understand
22 a question, ask me to rephrase it, and I'll do so as
23 many times as need be until you understand it.

24 A. Okay.

25 Q. If you don't know the answer, it's satisfactory to tell

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1 us you don't know the answer. If you need to stop and 2 think about it for a few minutes, we've got plenty of 3 time.	1 Q. Okay. So you would have been his secretary for a 2 period of several years?
4 A. Okay.	3 A. True.
5 Q. Okay? When were you employed by the county or the 6 court?	4 Q. Okay. And you were his secretary the entire time after 5 Mrs. Varner came until the split; is that correct?
7 A. I was a part-time at the law library, and then I forgot 8 what year I went over to Probation, but I worked 9 Juvenile Prosecution and Adult Probation. And then 10 when they split I went over to the Adult.	6 A. Correct.
11 Q. Would you be able to tell us what year you went to 12 Juvenile or the precursor to Juvenile, the unified 13 department?	7 Q. And did you do the bulk of Mrs. Varner's work?
14 A. No, I can't remember.	8 A. Yes.
15 Q. Okay. How many years in total were you a Probation 16 secretary?	9 Q. Did you know Mrs. Varner before she came into 10 Probation?
17 A. Nine.	11 A. Only to say hello. I only recognized her as a face.
18 Q. Nine.	12 Q. And how did it come about that you recognized her as a 13 face?
19 A. I was fired.	14 A. I think some friends, some other people that worked --
20 Q. What was the last year?	15 Sherry McGinty I think introduced me to her and, you 16 know, so I knew who she was. She said, you know, she's 17 with Children and Youth.
21 A. '97. '99. '97 or '99. I was fired.	18 And then right before she was hired on, during the 19 hiring process, I had talked with her with Gary in the 20 lunch room, just to say hello.
22 Q. Prior to the split did you work for one person in 23 particular?	21 Q. Prior to her coming on board she had been over in your 22 offices; is that what you're telling me?
24 A. No. I worked for several probation officers.	23 A. Occasionally.
25 Q. Who did you work with?	24 Q. And on those occasions when she was over in your 25 offers, it's your recollection was the purpose to see
Page 6	Page 8
1 A. Gary, Joe, Barb, Debra, Nick, Denny, Sam.	1 Mr. Graham for some business reason?
2 Q. How many secretaries were in Probation?	2 A. I think it was for Gary and Joe that she talked, 3 because it was right before she was being hired.
3 A. There were two.	4 Q. And I think you said you had lunch with them, or saw 5 them in the lunch room?
4 Q. And how many probation officers, roughly?	6 A. Um-hum.
5 A. 10.	7 Q. Which one was it? You saw them or had lunch with them?
6 Q. And the two of you divided all the probation officers?	8 A. No, no. Just in the lunch room, getting a soda or 9 something.
7 A. Right. Well, whoever brought the typing to us, we did.	10 Q. Did you see them together in the lunch room more than 11 once?
8 Q. Was it the case you could do typing for any probation 9 officer?	12 A. Yeah.
10 A. Yes.	13 Q. Frequently?
11 Q. And your other secretary could do typing for any 12 probation officer?	14 A. No, not frequently. I'd say two, three times.
13 A. Yes, um-hum.	15 Q. Two or three times ever, or two or three times a month?
14 Q. I've heard you referred to at various points as Gary's 15 secretary. Would that be an accurate description?	16 A. Two, three times ever.
16 A. Um-hum.	17 Q. When a phone call came for Mr. Graham, what was the 18 protocol? Did he answer his phone himself or did you 19 answer it?
17 Q. Did you consider yourself Gary's secretary?	20 A. It depended. Sometimes it went right to his phone, and 21 sometimes the calls came to me and then I would 22 transfer them to him.
18 A. Um-hum. Yes.	23 Q. Did he get frequent phone calls?
19 Q. Did Gary provide to you the bulk of your work?	24 A. Yes.
20 A. Yes.	25 Q. Before Mrs. Varner came on board in Probation do you
21 Q. And did that last until --	
22 A. Till the split.	
23 Q. Till the split?	
24 A. And then later on he became the institutional officer and I started doing typing for him again.	

Page 9	Page 11
1 recall him getting phone calls from Mrs. Varner?	1 A. Not -- I mean, he would get frustrated now and then, but no.
2 A. No.	2
3 Q. After she came on board, do you recall him getting phone calls from Mrs. Varner?	3 Q. Did you observe him treat Mrs. Varner in any different manner than he treated other employees?
4	4
5 A. If she was out in the field, yes.	5 A. When she first came on, Mr. Graham and Mr. Osenkarski
6 Q. Do you recall the phraseology Barb 1 and Barb 2 ever being used?	6 would take her on all the -- when they go to visit
7	7 clients or go to different seminars and stuff like,
8 A. Yes.	8 that they would -- she would go along. That seemed to
9 Q. Did you ever use it yourself?	9 be, I thought they were showing her the ropes, you
10 A. Yes.	10 know, how things were handled.
11 Q. Why did you use that term of art?	11 Q. Are you referring to routine training, or some type of
12 A. Barb 1 is his wife and Barb 2 was the co-worker, so I could distinguish between the two for him.	12 preferential treatment?
13	13 A. Routine training. And then also, like, when they would
14 Q. Was it your idea to coin that phrase, or did someone else?	14 have to go to visit different facilities where they
15	15 might have had people placed.
16 A. I'm not sure. I just know we set it as Barb 1 and Barb 2.	16 Q. Do you ever recall her being asked to go on some trip
17	17 that normally a new probation officer would not be
18 Q. Did the other secretary also use the phrase Barb 1 and Barb 2?	18 asked to go on?
19	19 A. No.
20 A. I think so.	20 Q. Any conference that normally a new probation officer
21 Q. And who was the other secretary?	21 would not be asked to go on?
22 A. Jenny was it for a while.	22 A. No. The only thing I thought was different, I think,
23 Q. Jenny, and the last name?	23 Gary also did our training, and I think Barb was asked
24 A. Crum.	24 to do that, and I was surprised about that.
25 Q. And was there another secretary besides her?	25 Q. Why were you surprised about that?
Page 10	Page 12
1 A. Fran was there, Fran Rose. And Kathy Zeigler.	1 A. Because I thought that there was a set number of people
2 Q. Did you hear all those women use the phraseology Barb 1 and Barb 2?	2 who did it and that was the way it was.
3	3 Q. And the set number of people was old timers in the
4 A. I think so.	4 Probation Department?
5 Q. Other than the secretaries, did you ever hear of probation officers use the phrase 1 Barb 1 and Barb 2?	5 A. Yes. Yes.
6	6 Q. And it was unusual for a brand new probation officer to
7 A. I believe so.	7 be part of the DUI training?
8 Q. Did you ever hear Gary being teased about Barb 1 or Barb 2?	8 A. Right. Right.
9	9 Q. Was that because there was some financial reward for
10 A. Yes.	10 being a DUI instructor?
11 Q. Can you give me an example of somebody teasing him?	11 A. I have no idea.
12 A. Just that they would say, you know, you've got a phone call, you know, is it Barb 1 or is it Barb 2. I never heard anything other than that.	12 Q. Before Mrs. Varner was hired did you ever hear a
13	13 discussion about whether she would be considered as a
14	14 candidate for employment?
15 Q. Was there in your estimation any sexual undertones to saying it's your first Barb or your second Barb?	15 A. I just heard them say she would be a really good person
16	16 to have on board, that she was a good worker.
17 A. No.	17 Q. And you heard them say it. Who was them?
18 Q. Did you understand -- from your observations of Barbara Varner and Gary Graham together before the split, how would you describe their working relationship?	18 A. Gary and Joe.
19	19 Q. Can you recall in particular what Mr. Graham would have
20	20 said?
21 A. Very good.	21 A. Just that she was really conscientious, a good worker
22 Q. Better than average?	22 and it would be good having her on the staff.
23 A. Yes, I think so.	23 Q. Would you characterize it as he glowed about her
24 Q. Were there people with whom Mr. Graham did not have a working relationship, that you observed?	24 abilities?
25	25 A. Yes.

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1 Q. And with Mr. Osenkarski, what would he say? 2 A. About the same thing.	1 Q. So it was a frequent occurrence for him to raise his voice; is that correct? 2 A. Pretty much, yes.
3 Q. Would you characterize Osenkarski also glowed about her abilities? 4 A. Yes, like she would be an asset to us.	3 Q. Now, you only recall the one instance with Mrs. Varner; is that right? 4 A. Right.
5 Q. And when you say they glowed about her abilities, were they more complimentary about her abilities coming in than was typical?	5 Q. With other male probation officers, was it unusual for Mr. Graham to raise his voice? 6 A. No.
7 MS. WALLET: I'm just going to object to the form of the question. You were the one that used the word glowed. She didn't say glowed, she agreed with that, however.	7 Q. Would you characterize this as occurring on a frequent basis? 8 A. Um-hum. Not as frequent as with some of the female, but yeah.
9 But you may answer the question. 10 THE WITNESS: No. If there were other ones that they felt would be a great asset, the same thing.	9 Q. In terms of his getting excitable and raising his voice at somebody, did he appear to do so indiscriminately between men and women? Or did he single out one sex more than the other? 10 A. No. I think it was pretty even.
11 BY MR. DELLASEGNA:	11 Q. Did you observe Mr. Graham to have favorites within the office? 12 A. Um-hum.
13 Q. Did Mrs. Varner seem to be the recipient of any special treatment when she came in?	13 Q. Was Ms. Varner a favorite? 14 A. In the beginning, yes.
15 A. No.	15 Q. Did that change at some point, from your personal observation?
16 Q. Now, where did you sit in relationship to Graham's office?	
17 A. He was down the hall and to the right.	
18 Q. You could not see him from your desk?	
19 A. No.	
20 Q. How about Mrs. Varner's office?	
Page 14	Page 16
1 A. She was behind me. 2 Q. Can you see her from your desk?	1 A. Yes. 2 Q. When did it change?
3 A. If I turned around.	3 A. Possibly about the time when we made the switch from Juvenile, you know, Juvenile and Adult.
4 Q. Did you have occasion to see the two interact on a daily basis?	4 Q. Okay. What did you observe? 5 A. He was, like, insistent and he became more demanding of people, and more critical. And I can remember one time saying to him, you know, if you would ask people instead of demanding you might get better results.
6 A. On some things, yes.	6 Q. Are you speaking of he became more critical of all his co-employees?
7 Q. Would you ever see Mr. Graham treat her, Mrs. Varner, rudely?	7 A. Right. 8 Q. In general or --
8 A. Once.	9 A. But more about Mrs. Varner.
9 Q. What do you recall seeing?	10 Q. It was enough so that you noticed all of a sudden he was picking on Mrs. Varner?
10 A. I recall him yelling at her about some case that she was working on, or some papers that she did. I don't remember.	11 A. Right. 12 Q. Did you have any understanding as to why all of a sudden he was picking on Mrs. Varner --
11 Q. I also remember him saying at the time that a reference to hiring middle-aged people or something like that.	13 A. No.
12 Q. When you say he yelled at her, did he raise his voice?	14 Q. -- when she had been a favorite person before?
13 A. Yes.	15 A. No, I had no idea.
14 Q. Was it unusual for Mr. Graham to raise his voice within the office?	16 Q. But was that how you perceived it, she had been a favorite person?
15 A. Not if he was excited.	17 A. Oh, yes.
16 Q. Did he have a loud voice when he got excited?	
17 A. Yes.	
18 Q. Is he an excitable man?	
19 A. Yes.	

	Page 17	Page 19
1	Q. And now was being picked on?	1 than around men?
2	A. Yes.	2 A. No.
3	Q. And that the change was sudden?	3 Q. Less?
4	A. Yes.	4 A. It didn't -- I don't see any difference between.
5	Q. All right. And did you ever ask Mr. Graham about that?	5 Q. Would you characterize Mr. Graham as treating men and
6	A. No.	6 women equally, whether he was really good if he liked
7	Q. From what you observed before that sudden change, would	7 them or he was really bad if he did not like them?
8	you describe the two of them as being friendly?	8 A. I think he treated the men better.
9	A. Yes.	9 Q. Did you ever hear within the office the discussion of
10	Q. Would you describe the friendship as disproportionate,	10 whether any employees within the office were having
11	Mr. Graham more interested in Varner or more friendly	11 affairs?
12	to Varner, or both equally friendly to each other?	12 A. No.
13	A. I just perceived them as friendly co-workers, friendly	13 Q. Not once?
14	co-workers.	14 A. No.
15	Q. Within the office did they appear to be close friends?	15 Q. Okay. With regard to anybody, not just Graham and
16	A. No. Just friends.	16 Varner.
17	Q. The answer is no?	17 A. No. No.
18	A. No.	18 Q. Are you aware that one of the allegations in this case
19	Q. Now, the phrase Barb 1 and Barb 2 I think you told me	19 is whether or not Mr. Graham and Mrs. Varner had an
20	was because of the frequency of calls you got from each	20 affair?
21	Barb; is that right?	21 A. I wasn't until later, but yes.
22	A. Well, just because when the phone call would come in	22 Q. Did the thought ever cross your mind when you were his
23	that's how we would say just which one was which.	23 secretary and observed them on a daily basis that they
24	Q. Did the number of phone calls from Barb 2 decline after	24 were having an affair?
25	their relationship deteriorated?	25 A. Never.
	Page 18	Page 20
1	A. I don't know because by then I was gone. I was over.	1 Q. You said Mr. Osenkarski looked favorably upon
2	Q. I'm a little unclear as to how you observed their	2 Mrs. Varner's arrival in the office?
3	relationship worsen, when you say it worsened after the	3 A. Yes.
4	split and you were gone then.	4 Q. Did his attitude remain favorable throughout your time
5	A. I would say it probably declined then, because she	5 in the office, or did it change as Graham's attitude
6	was -- she wasn't out of the office as much and she	6 changed?
7	wasn't calling in.	7 A. I think it changed when Graham's attitude changed.
8	Q. Why does this mean the relationship declined?	8 Q. What did you observe Mr. Osenkarski do?
9	A. I don't know.	9 A. He just again didn't talk to her like he used to.
10	Q. You took it to mean the relationship declined?	10 That's the only thing I could see.
11	A. No. They -- he stopped inviting her to go to the	11 Q. Have you had sexual harassment training while employed
12	different places. He started yelling at her. He	12 by the court?
13	didn't visit in her office. So that's where I took it	13 A. Yes.
14	as the decline.	14 Q. Okay. And do you recall how many training sessions you
15	Q. Did you ever hear Mr. Graham curse in the office?	15 went to?
16	A. He may have, but he wasn't the only one.	16 A. I think I had two.
17	Q. It was, in fact, the use of curse words a common	17 Q. And from those sessions, did you acquire an
18	feature in the office?	18 understanding of what sexual harassment is?
19	A. Yes. It didn't necessarily, it wasn't necessarily said	19 A. Yes. And we've been doing it all along for years.
20	in anger, just, you know, it was said.	20 MS. WALLET: How do you mean that? You've been
21	Q. When you heard Mr. Graham use curse words, would they	21 harassing all along?
22	be just in general conversation, or directed to	22 THE WITNESS: Yeah, we were. I mean, you know,
23	anybody?	23 things that we would say in the office, like, oh, you
24	A. Just in general.	24 look really nice today or, you know, it could all be
25	Q. Did you observe him use curse words more around women	25 taken as sexual harassment.

Page 25	Page 27
1 Q. Were you ever offended by any sexual harassment banter 2 you heard in the office? 3 A. No. 4 Q. Did any women in the office ever tell you they were 5 offended by sexual banter? 6 A. Yes. 7 Q. Who is that? 8 A. Kerry, Julie Staver, and Deb Anderson. 9 Q. And they were all secretaries? 10 A. Julie was a probation officer, Kerry was a probation 11 officer, and Deb had been a secretary. 12 Q. Are we talking about Kerry Houser? 13 A. Yes. 14 Q. And what were they talking about? 15 A. That was about the harassment suit, Kerry. 16 Q. That was about the '93 harassment? 17 A. (Witness nodded head affirmatively.) 18 Q. After that? 19 A. No. 20 Q. After the '93 harassment suit do you recall the level 21 of sexual banter dropping? 22 A. Absolutely. 23 Q. Some remedial action had apparently been taken? 24 A. Yes. 25 Q. At any time did you ever hear Mrs. Varner complain to	1 A. Yes, I did. 2 Q. And who said that? 3 A. Joe. 4 Q. And can you tell me what you remember about the context 5 of this? 6 A. There were, like, three or four probation officers in 7 Tom Boyer's office at the time, and they were referring 8 to Deb Anderson, Julie Staver, Kerry, and I don't 9 remember if there was another person or not, but that's 10 what I took it as, and it was just a remark about the 11 cunt club. 12 Q. Were you offended by that reference? 13 A. I was a little surprised, but I wasn't offended. 14 Q. Why were you surprised? 15 A. I didn't expect to hear something like that. 16 Q. Did you think it was appropriate workplace language? 17 A. No. 18 Q. After you heard that, what did you do? 19 A. Continued typing. 20 Q. Okay. Did you tell somebody else? 21 A. No. 22 Q. Did you tell anybody that you had heard it? 23 A. I was -- I finally said, yes, I had heard it, when I 24 was questioned about it. 25 Q. Did you ever go to Mr. Osenkarski and tell him that you
Page 26	Page 28
1 you or to others about Graham? 2 A. I think just in when he first started nit-picking at 3 her reports and stuff like that. She wasn't sure what 4 he wanted. 5 Q. Was not happy about the nit-picking? 6 A. Right. 7 Q. But do I understand correctly that Gary could be a 8 nit-picker, nit-pick with other people as well? 9 A. Yes. 10 Q. That was his style? 11 A. (Witness nodded head affirmatively.) 12 Q. And again -- 13 A. Yes. 14 Q. -- and he didn't discriminate between men and women? 15 A. Yes. 16 MR. DELLASEGNA: That's all. 17 MR. ADAMS: I don't have any questions. 18 MS. WILLIAMS: I have no questions for you, 19 Mrs. Boyles. 20 MS. BLANCHARD: I have nothing. 21 BY MS. WALLET: 22 Q. Mrs. Boyles, tell me what you remember about the Kerry 23 Houser's complaint. 24 A. Reference was made to a cunt club. 25 Q. Did you hear that?	1 were offended by that? 2 A. No. 3 Q. Why not? 4 A. Just thought I'd let it go, because I didn't think it 5 was to my -- it wasn't directed to me. 6 Q. Is there any doubt in your mind that it was directed to 7 the female probation officers? 8 A. No. 9 MR. ADAMS: Directed to or about? I'm a little 10 confused. She said it wasn't directed to anyone. 11 THE WITNESS: Not to any one person, but it was 12 directed to the two probation officers and the 13 secretary, one secretary. 14 MR. ADAMS: You mean as about those persons? 15 THE WITNESS: Right. 16 MR. ADAMS: Okay. 17 BY MS. WALLET: 18 Q. So the cunt club consist consisted of the two 19 probation officers and the other secretary? 20 A. I believe so, yes. 21 Q. Now, who came to you to ask you whether you had heard 22 about this? 23 A. I think the chief did, Ken Bolze. 24 Q. And what do you remember him asking you about? 25 A. He asked if I had heard reference, the reference that

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1 A. Yes.		1 Q. You've given me an impression, which I understand, but
2 Q. What did she tell you?		2 what did you specifically observe?
3 A. That I've even -- I even was there. They're very		3 A. Well, they would spend a lot of time together, talking.
4 happy.		4 Like I said, they would go to seminars, where I didn't
5 Q. I'm sorry, you were?		5 see the women going, you know, as frequently.
6 A. They're very happy together. I was even at her place a		6 Q. Do you have any idea what ratio of times the men went
7 few times.		7 versus the women?
8 Q. Did she ever complain to you about her husband or her		8 A. No, I don't.
9 relationship with her husband?		9 Q. So you don't have any real specifics on that?
10 A. No.		10 A. No. No.
11 Q. Did her husband call her at work?		11 Q. It's sort of a general impression you have?
12 A. Yes.		12 A. Right.
13 Q. Frequently?		13 Q. Is Mark Galbraith still working there as a probation
14 A. Yes.		14 officer?
15 MS. WALLET: Thank you very much, Mrs. Boyles.		15 A. No, he's not. He's in business with his father.
16 THE COURT: Is that all?		16 Q. When did he leave, if you recall?
17 MR. DELLASEGNA: No.		17 A. I'm guessing '97, '98, somewhere in there.
18 BY MS. WILLIAMS:		18 MS. WILLIAMS: Thanks. That's all I have for
19 Q. Ms. Boyles, my name is Taylor Williams. I represent		19 Mrs. Boyles.
20 the Ninth Judicial District of Pennsylvania, Court of		20 BY MR. ADAMS:
21 Common Pleas of Cumberland County.		21 Q. Ms. Boyles, I represent Mr. Osenkarski. My name's
22 Do you recall, since in your position with the		22 Paul Lancaster Adams. How are you. I'll just be
23 court you answered the telephone, do you recall any		23 brief.
24 time when there were a lot of hang-up calls?		24 Going back to the reference comment made by
25 A. I had talked to him about that. I can't remember. It		25 Mr. Osenkarski of the cunt club, were there any other
Page 42		Page 44
1 may have happened but I can't remember.		1 females nearby other than you to overhear that
2 Q. You don't remember at all?		2 conversation?
3 A. No.		3 A. I don't think so.
4 Q. And you can't pinpoint any time frame when that would		4 Q. Okay. Would you agree that that comment is off-color?
5 have happened?		5 A. Yes.
6 A. No.		6 Q. Were offhand or off-color jokes prevalent in the
7 Q. You indicated that you were fired from your position.		7 office?
8 A. Yes.		8 A. Occasionally.
9 Q. Can you give me the details of why you were fired?		9 Q. Jokes being distinguished from comments, but jokes?
10 A. Yes. I became chronically ill. I couldn't walk, I		10 A. Yes.
11 couldn't sit. I was missing work. And they said that		11 Q. And those jokes off-color were made by men?
12 because I couldn't be there, I was fired.		12 A. Mostly, yes.
13 Q. So you were fired for absenteeism is your		13 Q. Also by women?
14 understanding?		14 A. Maybe once or twice, but mostly men.
15 A. Yes. Yes.		15 Q. Okay. But you did hear some by women as well?
16 Q. Do you have any ill feelings about that toward the		16 A. Yes.
17 court or the county?		17 Q. You said that you had been to Ms. Varner's home a few
18 A. Very disappointed.		18 times?
19 Q. You indicated that you thought that men were being		19 A. Yes.
20 treated better than women. What specifically did you		20 Q. What were the circumstances of the first visit to her
21 observe to form that --		21 home?
22 A. It's just kind of like --		22 A. We both have children the same age and we, you know, we
23 Q. -- impression?		23 discussed them.
24 A. Like the good old boys club, you know, that		24 I think the first time I went to her place was a
25 camaraderie.		25 birthday party for her grandson.

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1 Q. And were other employees of the Juvenile Probation 2 Department present as well?	1 once to take me for a medical procedure.
3 A. No.	2 Q. Has anyone else from the Juvenile Probation Department 3 ever been to your home other than those two?
4 Q. Okay. Were you the only --	4 A. Mark Galbraith.
5 A. Yes.	5 Q. Okay.
6 Q. -- employee -- let me finish the question, I'm sorry.	6 A. I'm trying think. Bill Brandt. That's it.
7 Were you the only employee from the Juvenile Probation 8 Department present?	7 MR. ADAMS: No further questions. Thank you.
9 A. Yes.	8 THE WITNESS: Okay.
10 Q. With your children?	9 BY MR. DELLASEGHA:
11 A. I wasn't with my children. My children are grown the same as hers.	10 Q. Did you like working for Gary?
13 Q. Okay, okay. So you were clearly the only person from 14 your office?	11 A. Yes.
15 A. Yes.	12 Q. Did you like working for Joe?
16 Q. Okay. How about the second time you were in 17 Ms. Varner's home?	13 A. Joe? Yeah. I did more for Gary than I did for Joe, 14 yeah.
18 A. I had done some typing for her, for her class, and she 19 was -- she paid me to do her -- she was going for her 20 master's and I did her typing. And I took it down to 21 her place to drop it off.	15 Q. Going back to Barb 1 and Barb 2, was the frequency of 16 Barb 1 and Barb 2 calls roughly equal?
22 Q. Okay. Did Ms. Varner often ask you to do typing for 23 her for classes that she was taking?	17 A. Yes.
24 A. I do for both her and Debra.	18 Q. Have you ever talked with Ms. Wallet before today?
25 Q. Okay. Debra?	19 A. I knew her when I worked in the law library. I 20 recognized her.
25 BY MS. BLANCHARD:	
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1 A. Green.	1 Q. A couple questions, sorry. This will be quick, I 2 promise.
2 Q. Green, okay. Are you good friends with Debra Green?	3 The conversation with Mark Galbraith in which he 4 told you that Gary made a comment to him about 5 remember, I got -- could you tell me again what that 6 statement was? I didn't quite get it.
3 A. Yes.	7 A. Mark said Gary said: Remember, I got you your job and 8 I can take it away from you.
4 Q. You have to say yes or no.	9 Q. And when did Mark tell you about this statement?
5 A. Yes. Yes. Yes.	10 A. It was right after he was subpoenaed or asked to give a 11 deposition about the case or testify in the case.
6 Q. Do you consider yourself good friends with Ms. Varner?	12 Q. Was this recently or was this a few years ago?
7 A. Yes. Have I seen them a lot lately? No.	13 A. It was a few years ago.
8 Q. Does that bother you, that you haven't seen them in a 9 while?	14 Q. And did Mark tell you whether or not he responded to 15 Gary's statement?
10 A. No, because I know they're busy.	16 A. No, he didn't say.
11 Q. Okay, fair enough. Any other visits to Ms. Varner's 12 home that you would like to share?	17 Q. Do you know if he did?
13 A. No, that was it.	18 A. No.
14 Q. Has Ms. Varner ever been to your home?	19 Q. Do you know if Gary made any other statements of that 20 nature to Mark?
15 A. Yes, when I first moved in. She came to show me what 16 she thought of how I decorated, to give me some help.	21 A. I think it was Joe that did. No. I don't think so.
17 Q. When was this?	22 Q. What was the statement?
18 A. 1997.	23 A. About owing. He wanted him to do some work at his house and said you owe me or something.
19 Q. Okay. And was she helpful?	24 Q. Was that in connection with this case?
20 A. Yes.	
21 Q. Any other visits to your home by Ms. Varner?	
22 A. No.	
23 Q. How about Debra Green to your home?	
24 A. Debra Green has been to my house twice, and both times 25 they were to pick me up: Once to go to dinner, and	